

Exhibit P

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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NICE SYSTEMS, INC.,)	
)	
Plaintiff,)	
)	
vs.)	
)	No. 16-cv-01759-DWF-FLN
PEDRO J. BECQUER,)	
)	
Defendant.)	
)	

30(b)(6) DEPOSITION OF LAURIE DAHLGREN

Thursday, January 12, 2017

SAN FRANCISCO, CALIFORNIA

EcoScribe Job No.: 25498

REPORTED BY: A. MAGGI SAUNDERS,

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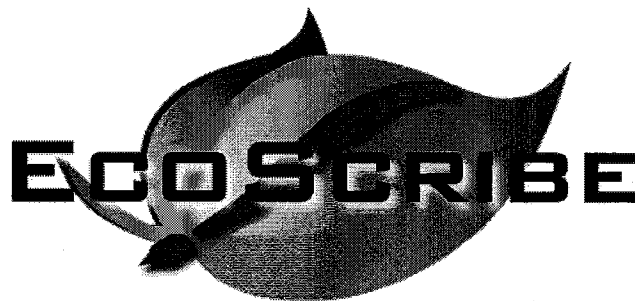


Exhibit P

NICE SYSTEMS vs PEDRO J. BECQUER
Laurie Dahlgren 30(b)(6)

Job 25498
Pages 78..81

<p style="text-align: right;">Page 78</p> <p>1 Q. If we turn to the page marked Mirantis 2 00282, so the second page of this document, if you look 3 at the very bottom it says: 4 "On October 28, 2015, 12:34 p.m. M 5 Teegardin wrote," 6 And then it carries on to the next page: 7 "I think we effectively have a SWAT team 8 as follows." 9 Can you read that next paragraph, Bullet 10 Point 1, out loud? 11 A. Sure. 12 "Pedro is the QB leading the team down 13 the field and managing the relationships 14 at TR. He has a plan for me to come 15 back and meet one [lever] higher then 16 sponsor Alex meet their big boss 17 after that." 18 Q. And then the second -- 19 MS. WANG: Just a moment, so I can ask 20 them to lower the noise outside. 21 MS. PIERSON: Q. We will just pause for a 22 moment and wait for your attorney to come back. [Brief 23 pause] 24 And can you also read the second bullet 25 point out loud?</p>	<p style="text-align: right;">Page 79</p> <p>1 A. Sure. 2 "Paul Roberts is the 'technical GM' 3 coordinating the Services team that will 4 do the work on site." 5 Q. And this is an e-mail sent from Mr. 6 Teegardin, correct? 7 A. Yes. 8 Q. What is he describing in this e-mail, to 9 the best of your knowledge? 10 A. The structure of the team that is working 11 with Thomson Reuters. 12 Q. So, in connection with Thomson Reuters, it 13 was Mr. Becquer's role to lead the team and manage the 14 relationship; is that correct? 15 A. Yes, and to coordinate the team that's 16 working on the account. 17 Q. Do you know approximately how many hours 18 Mr. Becquer spent working on the Thomson Reuters 19 account? 20 MR. STORMS: Objection. Foundation. 21 THE WITNESS: I don't know how many hours. 22 It appears to be a team effort. 23 MS. PIERSON: I'll just mark this also. 24 (Mirantis Sales Bonus Statement marked 25 Plaintiff's Exhibit 16 for</p>
<p style="text-align: right;">Page 80</p> <p>1 identification.) 2 THE WITNESS: (Reviewing the document.) 3 MS. PIERSON: Q. You've just been handed 4 a document marked Plaintiff's Exhibit 16. About 5 halfway down the page on the right, it is marked Mir- 6 -- the first page is marked Mirantis 000587. 7 Have you had time to look over this 8 document? 9 A. Yes. 10 Q. Do you recognize this document? 11 A. Yes. 12 Q. Was it produced by Mirantis in response to 13 Plaintiff's Subpoena? 14 A. Yes. 15 Q. What is this document? 16 A. This is a statement that is showing the 17 activity for Pedro Becquer for the period, August 10th, 18 2015 through December 31st, 2015. 19 Q. And we've discussed this before, about the 20 fact that his offer letter said August 10th, 2015, but 21 you weren't sure about his start date. 22 Does this confirm that Mr. Becquer's start 23 date was August 10th, 2015? 24 A. I would say this would confirm this, or a 25 payroll record would confirm this.</p>	<p style="text-align: right;">Page 81</p> <p>1 Q. Okay. 2 A. Confirm that date. 3 Q. Who or what department at Mirantis created 4 this document? 5 A. This would have come from Sales Operations 6 or Accounting. 7 Q. This is a document that Mirantis creates 8 in the normal course of business? 9 A. Yes -- 10 Q. And -- 11 A. -- to determine the results of the 12 salesperson. 13 Q. What do you mean by, "results of the 14 salesperson"? 15 A. What money they brought into the company. 16 Q. So, if we turn to page two of this 17 exhibit, which is marked Mirantis 000588, there appear 18 to be -- this appears to be a spreadsheet that has five 19 lines. 20 A. Mm-hmm. 21 Q. And it lists opportunities names, 22 Motoro- -- and it's a bit small, so I'm trying to read 23 it -- "Motorola," followed by certain numbers; 24 "Thompson Cloud Validate, Digital Develop Cloud Q4, 15, 25 Thompson Support Renewal, State Farm Training".</p>